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May 13, 2025

VIA ECF

Hon. Andrew L. Carter, Jr., District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: Sean Hall v. The City Of New York, New York City Health and Hospitals Corporation,
Correctional Medical Associates of New York, P.C., Dr. Raul Ramos, Dr. Ross
McDonald, Assistant Deputy Warden Lillian Benbow, Warden Clement Glenn, Medical
Does 1 – 7, C.O. Does 1 – 7
SDNY Index No.: 1:21-cv-02308-ALC
HPMB File No.: 611-3293

Dear Judge Carter:

The parties submit this joint status letter pursuant to Your Honor's directive at the status conference held on May 6, 2025. As was discussed at the conference, there are certain legal issues that the parties believe need to be resolved prior to any continued settlement negotiations, and/or in preparation for trial. Many of these issues were raised in our respective motions for summary judgment, but not decided in the Decision and Order dated March 31, 2025.

The parties jointly request a briefing schedule for further consideration of the following issue:

- 1) Was the estate of Dr. Raul Ramos properly served, and if it was, is a default judgment warranted at this stage of the litigation?

Defendants will submit a separate letter motion outlining additional issues that they believe require further rulings/briefing.

Update to the Court regarding Mr. Hall's medical condition:

Ms. Marashi received a call from Mr. Hall's wife on May 12, 2025 informing her that Mr. Hall suffered a stroke this past Friday May 9, and his condition remains critical, but,

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unfortunately, it does not look promising. Ms. Marashi will update the Court on such as more information becomes available.

Request for clarification regarding deadline to submit Amended Pre-Trial Order:

At the conference held on May 6, 2025, Your Honor set a deadline of June 17, 2025 to submit an Amended Pre-Trial Order. The minute entry dated May 8, 2025, however, states that the amended Pre-Trial Order is due May 30, 2025. The parties request clarification as to which deadline is applicable.

The parties appreciate Your Honor's willingness to consider the above issues further and thank Your Honor for your consideration and time.

Respectfully submitted,

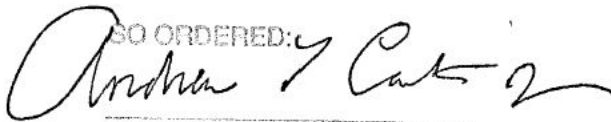


Alejandra R. Gil

/s/

P. Jenny Masashi

ARG/PJM/ja

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

May 23, 2025
New York, NY

The Court clarifies that the deadline to submit the Amended Pre-Trial Order is June 17, 2025.

The Court shall soon file a follow-up order setting forth further deadlines in this case.